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VIA ECF

The Hon. Analisa Torres
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007-1312
Email: Torres_NYSDChambers@nysd.uscourts.gov

Re: *Chen-Oster, et al. v. Goldman, Sachs & Co.* No. 10-6950 (AT) (RWL)

Dear Judge Torres,

I write on behalf of Plaintiffs and the Class regarding Plaintiffs' objections to Magistrate Judge Lehrburger's November 5, 2020 Order denying discovery of electronically-stored information from thirteen senior leaders of Goldman Sachs and denying Plaintiffs' request to amend the trial plan to permit anecdotal evidence of bias from these senior leaders to be introduced during Phase I of trial, ECF No. 1100, as well as Judge Lehrburger's November 30, 2020 denial of Plaintiffs' motion for reconsideration of same, ECF No. 1129. These objections were filed today at ECF Nos. 1141 (publicly, with redactions) and 1142 (under seal, without redactions).

Consistent with Rule IV.A.ii of Your Honor's Individual Practices in Civil Cases, Plaintiffs attempted to meet and confer with Goldman Sachs via telephone and email on December 14, 2020 regarding the sealing of Plaintiffs' filing but were not able to complete the process. Accordingly, Plaintiffs seek to file Exhibits 2-37 to their objections conditionally under seal because these Exhibits contain material designated confidential by Goldman Sachs.

Respectfully submitted,

/s/ Kelly M. Dermody
Kelly M. Dermody

cc: All parties, via ECF